

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Lifeline and Link Up	)	WC Docket No. 03-109

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**COMMENTS OF  
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES  
AND  
THE NEW JERSEY DIVISION OF RATE COUNSEL**

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## SUMMARY

The National Association of State Utility Consumer Advocates and the New Jersey Division of Rate Counsel (collectively, “Consumer Advocates”) urge the Federal Communications Commission (“FCC”) to continue to move forward with proposals to reform and enhance the Universal Service Lifeline and Link Up programs.

Consumer Advocates applaud the FCC’s recognition that affordability is one of the major barriers to broadband adoption. The FCC’s broadband deployment efforts are important but the Commission must address the affordability issue as well. An income-based broadband adoption gap exists today and broadband Internet access is becoming increasingly important for Americans if they are to participate in the modern economy.

However, the FCC’s ability to pursue its broadband agenda, including any plans to expand Lifeline and Link Up programs to encompass broadband subsidies, depends critically on re-defining broadband service as the telecommunications offering that it actually is. Absent such a reclassification, the FCC’s policy and decisions are vulnerable to legal challenge.

Consumer participation in the Lifeline and Link Up programs remains just one-third of total number of eligible participants. Consumer Advocates have expressed support for many of the FCC’s efforts to eliminate waste and inefficiencies in Lifeline/Link Up and in *all* universal service programs in earlier comments in this proceeding. It would be unwise public policy to squeeze those least able to afford to be connected to and to stay connected to the public switched network with unrealistic barriers to enrollment and eligibility verification. Consumer Advocates

remain concerned that verification rules and definitions focus too narrowly on residential addresses and fail to recognize the precarious living arrangements of many Americans. Indeed, these Americans may be the consumers who can benefit most from the Lifeline program.

Lifeline and Link Up support should provide maximum value for recipients and not more contribution to profit for the eligible telecommunications carrier (“ETC”) than other retail services. The FCC should reduce wasteful spending by amending its rules to clarify that ETCs may only charge service activation fees to Lifeline consumers in cases where it charges that fee to all consumers in the state, and that ETCs should develop of a cost-based reimbursement of Link Up charges. Consumer Advocates generally support changes to the sampling methodology to ensure validity of survey results: small ETCs should not be unduly burdened, but any verification sample size must be large enough to provide meaningful results.

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**I. INTRODUCTION**

The National Association of State Utility Consumer Advocates (“NASUCA”) as an organization<sup>1</sup> and the New Jersey Division of Rate Counsel (“Rate Counsel”) as an agency representing New Jersey consumers and as a member of NASUCA<sup>2</sup> (collectively, “Consumer

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<sup>1/</sup> NASUCA is a voluntary association of advocate offices in more than 40 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA’s members are designated by laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions as advocates primarily for residential ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General’s office). NASUCA’s associate and affiliate members also serve utility consumers but are not created by state law or do not have statewide authority.

<sup>2/</sup> Rate Counsel is an independent New Jersey State agency that represents and protects the interests of all utility consumers, including residential, business, commercial, and industrial entities. The Rate Counsel, formerly

Advocates”) hereby submit comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice (“Notice”) seeking targeted comments regarding the proposed Lifeline broadband pilot program; a “one-per-residence” limitation on Lifeline benefits; Link Up reimbursement; and the sampling methodology for consumer eligibility verification.<sup>3</sup> Consumer Advocates also incorporate by reference their previous comments on these issues.<sup>4</sup>

The outcome of this proceeding has immediate and long-term consequences for consumers because it directly affects the ability of low-income consumers to obtain both a voice connection to the public switched telephone network and to participate in modern society through broadband access to the Internet. Consumer Advocates commend the Commission’s effort to reduce waste, fraud, and abuse while ensuring that all consumers who are eligible for Lifeline and Link Up subsidies can avail themselves of those opportunities. Furthermore,

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known as the New Jersey Ratepayer Advocate, is in, but not of, the Department of Treasury. *N.J.S.A.* §§ 52:27EE-46 *et seq.*

<sup>3</sup> / Federal Communications Commission Public Notice, “Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding,” WC Docket Noss 11-42, 03-109; CC Docket No. 96-45, DA 11-1346, August 5, 2011 (“Notice”).

<sup>4</sup> / *In the Matter of Lifeline and Link-up, TracFone’s Petition for Modification of The One-Per-Household Condition*, WC Docket No. 03-109, Comments of the National Association of State Utility Consumer Advocates, Nov. 20, 2009 (“NASUCA Nov. 20, 2009 Comments”); *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal-State Joint Board on Universal Service*; CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109: Comments of the National Association of State Utility Consumer Advocates, April 21, 2011 (“NASUCA April 21 2011 Comments”); Reply Comments of the National Association of State Utility Consumer Advocates, May 10, 2011 (“NASUCA May 10 2011 Reply”); Reply Comments of the National Association of State Utility Consumer Advocates, May 25, 2011 (“NASUCA May 25 2011 Reply”); Comments of the New Jersey Division of Rate Counsel, April 21, 2011 (“Rate Counsel April 21 2011 Comments”); Reply Comments of the New Jersey Division of Rate Counsel, May 10, 2011 (“Rate Counsel May 10 2011 Reply”); and Reply Comments of the New Jersey Division of Rate Counsel, May 25, 2011 (“Rate Counsel May 25 2011 Reply”).

extending subsidies to broadband is long overdue: the FCC should expand the definition of supported services as well as the funding mechanism.<sup>5</sup>

## II. ISSUES FOR COMMENT

### A. Broadband Pilot Program

There is no doubt that broadband Internet access is an important public policy goal and that affordability is a key aspect of that discussion. As described by the FCC in its 2011 Lifeline NPRM:

Over the last decade, the communications landscape has been transformed by the advent of broadband. Access to broadband is increasingly important for all Americans to actively participate in our economy and our society. Broadband can serve as a platform for educational, economic and social opportunities. It can also minimize socioeconomic disparities. However, despite the potential opportunities available through broadband, many low-income Americans simply cannot afford a home broadband connection. There is a broadband adoption gap in the United States, with low-income households among those being left behind.<sup>6</sup>

Consumer Advocates reiterate their support for Lifeline funding for broadband<sup>7</sup> but also express concern that the pilots will “delay unduly the goal of ensuring that all low-income households, regardless of whether they are able to participate in a pilot program, receive Lifeline/LinkUp subsidies for broadband service.”<sup>8</sup> The further inquiry that the FCC has

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<sup>5</sup> / See The National Association of State Utility Consumer Advocates Resolution 2009-06, Calling for Lifeline and Link-Up Program Support for Broadband Internet Access Services and Devices; The National Association of State Utility Consumer Advocates Resolution 2010-02, Calling for Reform of the Lifeline Program Including Reform for Prepaid Wireless Lifeline Services.

<sup>6</sup> / *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109, Notice of Proposed Rulemaking, rel. March 4, 2011 (“2011 Lifeline NPRM”), at para. 266.

<sup>7</sup> / Rate Counsel April 21 2011 Comments, at 27.

<sup>8</sup> / *Id.*, at 28. See, also, Rate Counsel May 25 2011 Reply, at 6.

undertaken with the Public Notice includes, no doubt, critical issues that must be resolved before a broadband pilot can be undertaken. However, as Consumer Advocates have stated previously, the FCC should first classify broadband as a telecommunications service<sup>9</sup> and also must revise the definition of supported services to include broadband.<sup>10</sup> Furthermore, any fund that supports broadband service should be supported by a wider range of contributors (*i.e.* broadband services).<sup>11</sup>

### ***1. Scope of Funding***

The FCC seeks comment on whether universal service funds should be used to fund equipment and training as part of the envisioned broadband pilots. While Consumer Advocates recognize that a major barrier to broadband adoption is access to hardware,<sup>12</sup> other programs (*i.e.* E-Rate, and non-profit community groups that partner with broadband providers) may be better suited to address equipment issues. Consumer Advocates support NASUCA's initial reasoning on this issue: "NASUCA would warn against use of any universal service funding for any costs

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<sup>9</sup> / For a detailed discussion on this point, see *In the Matter of Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link-Up*, WC Docket No. 03-109, *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking*, Comments of the National Association of State Utility Consumer Advocates, April 18, 2011, at 27-35. See, also, Rate Counsel April 21 2011 Comments, at 25 and 30; Comments Of Advocates For Basic Legal Equality, Inc.; Community Voice Mail; Community Counseling Of Bristol County; Crossroads Urban Center; Disability Rights Advocates; Legal Services Advocacy Project; Low Income Utility Advocacy Project; National Center For Medical-Legal Partnership; National Consumer Law Center, on behalf of our low-income clients; New Jersey Shares; Ohio Poverty Law Center; Open Access Connections; Pennsylvania Utility Law Project; Pro Seniors, Inc.; Salt Lake Community Action Program; Texas Legal Services Center; Virginia Citizens Consumer Council ("Consumer Groups") April 21 2011 Comments, at 43.

<sup>10</sup> / See NASUCA April 21 2011 Comments, at 8; Rate Counsel April 21 2011 Comments, at 27.

<sup>11</sup> / Rate Counsel April 21 2011 Comments, at 28; NASUCA April 21 2011 Comments, at 32.

<sup>12</sup> / 2011 *Lifeline NPRM*, at para. 283.



or services that are not part of a basic broadband service that is provided by an ETC. The laundry list of possible support should be rejected by the FCC and universal service funding mechanisms should be designed along the traditional Lifeline procedures that are applicable to ‘voice telephony’.”<sup>13</sup>

## ***2. Consumer Eligibility for Pilot Program***

The FCC seeks comment on whether it should apply the same eligibility requirements for the broadband pilot program that are used for Lifeline voice services. The FCC cites the Benton Foundation proposal to raise the income threshold to 150% above federal poverty guidelines and allow residents of group homes to participate. In fact, this proposal comports with the eligibility requirements being considered by the FCC for voice services<sup>14</sup> and recommended by the Federal-State Joint Board on Universal Service, Lifeline and Link Up.<sup>15</sup> The eligibility threshold of 150% of federal poverty guidelines is reasonable: The 2011 U.S. Federal Poverty Guidelines (“FPL”) established that a family of two with income lower than \$22,065 falls below 150% of the FPL, while a family of six falls below 150% of FPL with a household income at or below \$44,985.<sup>16</sup> The establishment of an identical threshold for voice and broadband service will ensure that there is less confusion among participants; eligible telecommunications carriers

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<sup>13</sup> / NASUCA April 21 2011 Comments, at 32.

<sup>14</sup> / *2011 Lifeline NPRM*, at para. 157. The proposal garnered a lot of support. See Rate Counsel April 21 2011 Comments, at 3; NASUCA May 25 2011 Reply, at 6. See, also, general support by other commenters, including Benton, et al. Comments at 5; Budget Comments at 6-7; COMPTTEL Comments at 18-19; Conexions Comments at 8; Cox Comments at 9; DCPSC Comments at 4; PUCO Staff Comments at 15.

<sup>15</sup> / *Federal-State Joint Board on Universal Service, Lifeline and Link Up*, CC Docket No. 96-45, WC Docket No. 03-109, *Recommended Decision*, 25 FCC Rcd 15598 (Jt. Bd. 2010) (2010 Recommended Decision), at 15601, para. 10.

<sup>16</sup> / Annual Update of the U.S. Dep’t. of Health and Human Servs. Poverty Guidelines, 76 Fed. Reg. 3,367, 3,637-38 (Jan. 20, 2011).

(“ETCs”); social services agencies; and potential participants than if the eligibility requirements were distinct for broadband. Indeed, a supported service is a supported service and consumers should have one income eligibility requirement for all supported services.<sup>17</sup>

### ***3. Barrier to Consumer Participation***

The FCC seeks comment on the National Association of Regulatory Utility Commissioners’ (“NARUC”) July 20, 2011 broadband pilot resolution. NARUC expresses concerns about any program that would require consumers to change providers; be forced to buy bundles; or otherwise face penalties for participating in Lifeline/Link Up. Consumer Advocates concur with the NARUC resolution that: “the FCC should require that Lifeline/Link-Up Broadband Service Pilot Program participants are not required to change local telephone service providers, purchase bundled broadband and voice services or otherwise are penalized in order to obtain Lifeline and Link-Up broadband services and enabling access devices.”<sup>18</sup>

### ***4. Broadband Pilot Evaluation***

The FCC seeks further comment on metrics related to pilot program evaluation. Certainly, no pilot should be started without adequate controls. However, the metrics discussion appears to be a bit premature given that the amount of the subsidy and issues regarding whether

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<sup>17</sup> / Consumer Advocates recognize that broadband is not yet a supported service but urge the Commission to change the definition of supported services to include broadband. For a detailed discussion on this point, see *In the Matter of Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link-Up*, WC Docket No. 03-109, *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking*, Comments of the National Association of State Utility Consumer Advocates, April 18, 2011, at 27-35.

<sup>18</sup> / Resolution Supporting a Low-Income Broadband Service Adoption Program, adopted by the NARUC Board of Directors July 20, 2011.

the subsidy will include equipment remain unresolved. Nonetheless, Consumer Advocates support the establishment of a mechanism to collect data and rigorous evaluation of any broadband program.

### **B. One-Per-Residence Limitation**

The FCC has proposed a limitation of one Lifeline and Link Up discount per residential address.<sup>19</sup> In the Public Notice, the FCC seeks focused comments on the issue. Consumer Advocates have expressed concerns related to defining residence.<sup>20</sup> For example, cell phone usage by consumers with unstable living situations has been a very important development, and focusing on residential living situations may work to the detriment of some consumers who do not have permanent living arrangements but require a telephone for potential employers.<sup>21</sup> Those people considered most on the margin of society are those that may have a need and benefit the most from Lifeline and Link Up programs. The FCC should ensure that it does not erect barriers to participation by too narrowly defining “residence” or “household” or by making verification procedures too onerous for consumers. NASUCA also expressed concerns about homeless individuals and group living situations.<sup>22</sup> Federal programs should not discriminate against the homeless and households that must seek temporary living arrangements that do not fit traditional housing definitions. Consumer Groups describe the problem with focusing on a physical address:

The effect of starting with the premise that you need a unique street address to

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<sup>19</sup> / *2011 Lifeline NPRM*, at para. 106.

<sup>20</sup> / *See, e.g.*, Rate Counsel April 21 2011 Comments, at 13; NASUCA April 21 2011 Comments, at 18-19.

<sup>21</sup> / Rate Counsel April 21 2011 Comments, at 13.

<sup>22</sup> / NASUCA Nov. 20, 2009 Comments, at 3-9; NASUCA April 21 2011 Comments, at 18-19.

qualify for Lifeline will be to erect barriers to Lifeline service for the sake of administrative efficiency. This provision would harm low-income households that live in group housing, have doubled-up because they cannot afford separate housing, use P.O. boxes or have a box on a rural route, etc. These customers will be presumed ineligible unless they can fit into a narrow exception. This provision would also exclude the homeless from participating in the Lifeline program. The National Low Income Housing Coalition's *Out of Reach* report finds that in no state can an individual working full-time at minimum wage afford a two-bedroom apartment at fair market value. In light of the insecure housing status of struggling low-income households, this rule would cause great harm and demonstrate insensitivity to a vulnerable subset of low-income households.<sup>23</sup>

As the FCC notes, many commenters recommended mirroring other federal benefit programs with household definition. Certainly, the Low Income Home Energy Assistance Program (LIHEAP) and U.S. Census Bureau definitions are an improvement over a "one-per-address" restriction on Lifeline subsidies: the focus is on the household or economic unit rather than the residential address.<sup>24</sup> However, as discussed above, Consumer Advocates, as well as other commenters,<sup>25</sup> have expressed concerns that even those proposed definitions may still limit participation by the homeless or those persons living in group living situations (*i.e.* nursing homes or shelters).

The FCC asks whether requiring ETCs to follow TracFone's procedures addresses some of these issues.<sup>26</sup> Consumer Advocates urge the FCC to investigate TracFone's procedures more carefully. On the surface, it appears to rely on too much discretion on the part of the ETC;

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<sup>23</sup> / Consumer Groups, at 18. See, also, *id.*, at 19, wherein Consumer Groups urge the Commission to consider that it would be contrary to the Telecommunications Act goal of preserving the availability of voice service for low-income consumers to "exclude some of the most vulnerable low-income households for the sake of administrative efficiency."

<sup>24</sup> / NASUCA April 21 2011 Comments, at 18-19; Rate Counsel May 10 2011 Reply, at 21.

<sup>25</sup> / See, e.g., Massachusetts DTC April 21 2011 Comments, at 20.

<sup>26</sup> / Notice, at 5, citing Letter from Mitchell F. Brecher, Greenberg Traurig, to Arlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 03-109, 11-42, CC Docket No. 96-45 (filed June 1, 2011).

require more definition; and still focuses on the residential address. Among other questions that could be asked: what documentation is considered acceptable? How is the process working?

The FCC asks whether MFY Legal Services' proposal that the FCC mirror the National Telecommunications and Information Administration's ("NTIA") rule for a limited waiver of the household-based requirement for Digital-to-Analog Converter Box Coupon Program for residents living in nursing homes and assisted living facilities is appropriate.<sup>27</sup> Consumer Advocates support rules that take nursing home and assisted living facilities into account. The NTIA rules appear to address this specific issue and Consumer Advocates do not oppose the rules. However, as stated above, the FCC must ensure that other groups are offered exceptions to definitional rules as appropriate.

### **C. Link Up**

The FCC seeks comment on eliminating Link Up support and reimbursement; basing Link Up reimbursement on actual costs; and on providing reimbursement only in situations when a service call to the residence is required for service initiation.<sup>28</sup> In initial comments, Rate Counsel supported the proposal that ETCs submit reimbursement documentation to USAC and argued that this would not be burdensome because ETCs must already maintain records concerning this issue.<sup>29</sup> Consumer Advocates also supported amending Commission rules to define "the customary charge for commencing telecommunications service" as "the ordinary

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<sup>27</sup> / Notice, at 5.

<sup>28</sup> / *Id.*, at 6-7.

<sup>29</sup> / Rate Counsel April 21 2011 Comments, at 15-16.

initiation charge that an ETC routinely imposes on all customers within a state.”<sup>30</sup> The Commission should set a reasonable reimbursement cap based on cost. As NASUCA stated: “it would be appropriate for ETCs to be recompensed only for their costs – rather than revenues – for activation charges.”<sup>31</sup> Under no circumstances should the Lifeline fund pay for service initiation fees that are only applied to Lifeline consumers.

#### **D. Verification of Consumer Eligibility for Lifeline – Sampling Methodology**

In the *2011 Lifeline NPRM* the FCC proposed to amend 54.410 of its rules to establish a uniform method of verification sampling for all ETCs in all states. The FCC is now seeking additional comment.<sup>32</sup> Rate Counsel generally supported changes to the sampling methodology to ensure validity of survey results.<sup>33</sup> While Consumer Advocates recognize that small ETCs should not be unduly burdened, any verification sample size must be large enough to provide meaningful results.

The sample-and-census methodology proposed by the FCC allows for an ETC to sample its customers for eligibility unless or until a specific threshold rate of ineligibility is met. In such cases, the ETC would be required to undertake a census of all of its Lifeline customers.<sup>34</sup> Regarding the sample-and-census methodology, the Montana Independent Telecommunications Systems, LLC (“Montana ITS”) argued the following:

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<sup>30</sup> / Rate Counsel April 21 2011 Comments, at 15; Rate Counsel May 10 2011 Reply, at 14; NASUCA April 21 2011 Comments, at 12-13.

<sup>31</sup> / NASUCA April 21 2011 Comments, at 13. NASUCA also recommended a proxy cost to be determined by FCC Staff. Id.

<sup>32</sup> / Notice, at 7-8.

<sup>33</sup> / Rate Counsel April 21 2011 Comments, at 21.

<sup>34</sup> / *2011 Lifeline NPRM*, at para. 182.

The FCC's proposal for a sample and census approach for verification requires ETCs in all states to uniformly sample on an annual basis at least 300 Lifeline participants to verify eligibility information. Requiring small rural telecommunications providers to sample at least 300 Lifeline participants in effect requires them in many cases to sample ALL of their Lifeline participants. Northern Telephone Cooperative, Inc., for example, has fewer than 1,500 total telecommunications subscribers. InterBel Telephone Cooperative, Inc. has fewer than 4,000 subscribers. Neither company has more than 300 total Lifeline participants. Under the FCC proposal, companies such as Northern and InterBel would have to sample and verify ALL of their Lifeline subscribers every year. These two examples demonstrate how the sample-and-census approach would place disproportionate burdens on the smaller companies which, in turn, have the least resources and abilities to absorb the costs of taking on additional responsibilities for administering federal programs.<sup>35</sup>

Yet, Montana ITS offered no alternative to the FCC's sample-and-census proposal.

CenturyTel argued that the sample-and-census approach would be "unduly burdensome" if a census must be performed.<sup>36</sup> Yet, the census would be performed because the sample suggested an unacceptable level of ineligibility. Such an approach hardly seems onerous. The ETCs have an obligation to assist in reducing fraud and they have not provided any estimate of increased costs related to sample size or alternative proposals.

CenturyTel expressed the concern that many consumers may be de-enrolled due to nonresponse and suggests that state agencies could verify continued eligibility in some cases through their databases (*i.e.* if the consumer remains eligible for other programs).<sup>37</sup> In contrast, Commissioner Ann Boyle, Nebraska Public Service Commission in July 21, 2011 *ex parte* letter argued that Lifeline subscribers must not be "spoon fed" and have an obligation to respond if

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<sup>35</sup> / Montana Independent Telecommunications Systems, May 10 2011 Reply, at 5.

<sup>36</sup> / CenturyLink April 21 2011 Comments, at 18.

<sup>37</sup> / *Id.*, at 19.

they are receiving subsidies.<sup>38</sup> Consumer Advocates agree that Lifeline recipients have obligations related to their Lifeline service, but verification and de-enrollment must be undertaken with great care and consumers should be clear about their obligations to respond to certification requests when they initially sign up for Lifeline service.

### **III. CONCLUSION**

Consumer Advocates appreciate the opportunity to provide these comments on these crucial issues for the Lifeline and Link Up programs. Consumer Advocates urge the FCC to consider the views set forth here and to consider the impact of any proposals to reform the Lifeline and Link Up programs on Lifeline participants; eligible Lifeline participants; and on consumers who pay into the fund.

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<sup>38</sup> / Letter from Ann C. Boyle, Commissioner, Nebraska Public Service Commission, to Julius Genachowski, Chair, Federal Communications Commission, Re: Lifeline Reform, July 13, 2011.



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